

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
CRIMINAL DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	1:20CR09
	)	
Nima Rodefshalom, et al.	)	
	)	
Defendant.	)	

DECLARATION OF PUBLICATION

In accordance with 21 U.S.C. § 853(n)(1) and Rule 32.2(b)(6)(C) of the Federal Rules of Criminal Procedure, notice of the forfeiture was posted on an official government internet site ([www.forfeiture.gov](http://www.forfeiture.gov)) for at least 30 consecutive days, beginning on April 01, 2021 and ending on April 30, 2021. (See, Attachment 1).

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 02, 2021 at Pittsburgh, PA.

/s/ Lee J. Karl

Lee J. Karl

AUSA

Joseph F. Weis, Jr. U.S. Courthouse

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Attachment 1

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA, CRIMINAL DIVISION  
COURT CASE NUMBER: 1:20CR09; NOTICE OF FORFEITURE**

Notice is hereby given that on March 30, 2021, in the case of U.S. v. Nima Rodefshalom, et al., Court Case Number 1:20CR09, the United States District Court for the Western District of Pennsylvania entered an Order condemning and forfeiting the following property to the United States of America:

\$1,004,714.39 in funds from bank account #8431482523 held in the name of Joshua Rodef at Wells Fargo Bank, N.A. in Los Angeles CA. Acct# 8431482523 (20-FBI-003280) which was seized from Joshua Rodef on May 21, 2020 at Wells Fargo Bank, 10920 Wilshire Blvd., located in Los Angeles, CA

\$1,263,695.36 in funds seized from bank account #8431482440 held in the name of J.A.R. Enterprise at Wells Fargo Bank in Los Angeles, CA Acct# 8431482440 (20-FBI-003281) which was seized from J.A.R. Enterprise on May 21, 2020 at Wells Fargo Bank, 10920 Wilshire Blvd., located in Los Angeles, CA

\$29,357.31 in funds seized from bank account #153149869 held in the name of Nima Rodefshalom at Citibank in Los Angeles, CA Acct# 153149869 (20-FBI-003282) which was seized from Nima Rodefshalom on May 22, 2020 at Citibank, 10900 Wilshire Blvd., located in Los Angeles, CA

\$667,089.15 in funds seized from bank account #153149851 held in the name of Nima Rodefshalom at Citibank in Los Angeles, CA Acct# 153149851 (20-FBI-003283) which was seized from Nima Rodefshalom on May 22, 2020 at Citibank, 10900 Wilshire Blvd., located in Los Angeles, CA

\$937,442.76 in funds seized from bank account #500407283 held in the name of Specialty Pharmacy Management of America, Inc. at Citibank in Los Angeles, CA Acct# 500407283 (20-FBI-003284) which was seized from Specialty Pharmacy Management of America, Inc. on May 22, 2020 at Citibank, 10900 Wilshire Blvd., located in Los Angeles, CA

\$830,869.03 in funds seized from bank account #3361367278 held in the name of Joseph Kohan at JP Morgan Chase in Los Angeles, CA Acct# 3361367278 (20-FBI-003285) which was seized from Joseph Kohan on March 03, 2020 at JP Morgan Chase, 10901 Wilshire Blvd., located in Los Angeles, CA

\$773,080.42 in funds seized from bank account #872823083 held in the name of Emerson Pharmacy Inc., DBA Loyola Pharmacy at JP Morgan Chase in Los Angeles, CA Acct# 872823083 (20-FBI-003286) which was seized from Emerson Pharmacy Inc., DBA Loyola Pharmacy on March 03, 2020 at JP Morgan Chase, 10901 Wilshire Blvd., located in Los Angeles, CA

\$374,414.64 in funds seized from bank account #802076195 held in the name of Insure Nutrition, Inc. at JP Morgan Chase Bank in Los Angeles, CA Acct# 802076195 (20-FBI-003287) which was seized from Insure Nutrition, Inc. on March 03, 2020 at JP Morgan Chase, 10901 Wilshire Blvd., located in Los Angeles, CA

\$324,625.35 in funds seized from bank account #807750695 held in the name of Solutech Pharmaceuticals LLC DBA Rainbow Gold at JP Morgan Chase Bank in Los Angeles, CA Acct# 807750695 (20-FBI-003288) which was seized from Solutech Pharmaceuticals LLC DBA Rainbow Gold on March 03, 2020 at JP Morgan Chase, 10901 Wilshire Blvd., located in Los Angeles, CA

\$139,703.99 in funds seized from bank account #886618300 held in the name of Genorex Pharmaceutical LLC at JP Morgan Chase Bank in Los Angeles, CA Acct# 886618300 (20-FBI-003292) which was seized from Genorex Pharmaceutical LLC on March 03, 2020 at JP Morgan Chase, 10901 Wilshire Blvd., located in Los Angeles, CA

\$71,039.93 in funds seized from bank account #3600588132 held in the name of Genorex Pharmaceutical, LLC at JP Morgan Chase bank in Los Angeles, CA Acct# 3600588132 (20-FBI-003293) which was seized from Genorex Pharmaceutical, LLC on March 03, 2020 at JP Morgan Chase, 10901 Wilshire Blvd., located in Los Angeles, CA

\$883,818.12 in funds seized from bank account #907327006 held in the name of DTST Ventures LLC DBA ABI Pharmacy at JP Morgan Chase Bank in Los Angeles, CA Acct# 907327006 (20-FBI-003310) which was seized from DTST Ventures LLC DBA ABI Pharmacy on March 03, 2020 at JP Morgan Chase, 10901 Wilshire Blvd., located in Los Angeles, CA

\$1,160,298.04 in funds seized from bank account #727095510 held in the name of Affordable Pharmacy, Inc. at JP Morgan Chase bank in Los Angeles, CA Acct# 727095510 (20-FBI-003313) which was seized from Affordable Pharmacy Inc. on March 03, 2020 at JP Morgan Chase, 10901 Wilshire Blvd., located in Los Angeles, CA

\$1,220,577.37 in funds seized from bank account #927693986 held in the name of Vitamed, Inc. at JP Morgan Chase bank in Los Angeles, CA Acct# 927693986 (20-FBI-003314) which was seized from Vitamed, Inc. on March 03, 2020 at JP Morgan Chase, 10901 Wilshire Blvd., located in Los Angeles, CA

\$1,780,189.01 in funds seized from bank account #121718727 held in the name of Vitamed, LLC at JP Morgan Chase bank in Los Angeles, CA Acct# 121718727 (20-FBI-003315) which was seized from Vitamed, Inc. on March 03, 2020 at JP Morgan Chase, 10901 Wilshire Blvd., located in Los Angeles, CA

\$13,652,531.55 in funds seized from bank account #107387729 held in the name of ASC Pharmaceutical, LLC at JP Morgan Chase bank in Los Angeles, CA Acct# 107387729 (20-FBI-003316) which was seized from ASC Pharmaceutical, LLC on March 03, 2020 at JP Morgan Chase, 10901 Wilshire Blvd., located in Los Angeles,

CA

The United States hereby gives notice of its intent to dispose of the forfeited property in such manner as the United States Attorney General may direct. Any person, other than the defendant(s) in this case, claiming interest in the forfeited property must file an ancillary petition within 60 days of the first date of publication (April 01, 2021) of this Notice on this official government internet web site, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(n)(1). The ancillary petition must be filed with the Clerk of the Court, Room 311, Joseph F. Weis, Jr. U.S. Courthouse, Pittsburgh, PA 15219, and a copy served upon Assistant United States Attorney Lee J. Karl, Joseph F. Weis, Jr. U.S. Courthouse, 700 Grant Street, Suite 4000, Pittsburgh, PA 15219. The ancillary petition shall be signed by the petitioner under penalty of perjury and shall set forth the nature and extent of the petitioner's right, title or interest in the forfeited property, the time and circumstances of the petitioner's acquisition of the right, title and interest in the forfeited property and any additional facts supporting the petitioner's claim and the relief sought, pursuant to 21 U.S.C. § 853(n).

Following the Court's disposition of all ancillary petitions filed, or if no such petitions are filed, following the expiration of the period specified above for the filing of such ancillary petitions, the United States shall have clear title to the property and may warrant good title to any subsequent purchaser or transferee.

The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. See 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, see 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). The petition for remission need not be made in any particular form and may be filed online or in writing. You should file a petition for remission not later than 11:59 PM EST 30 days after the date of final publication of this notice. See 28 C.F.R. Section 9.3(a). The <https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition for remission form that may be mailed and the link to file a petition for remission online. If you cannot find the desired assets online, you must file your petition for remission in writing by sending it to Assistant United States Attorney Lee J. Karl, Joseph F. Weis, Jr. U.S. Courthouse, 700 Grant Street, Suite 4000, Pittsburgh, PA 15219. This website provides answers to frequently asked questions (FAQs) about filing a petition for remission. You may file both an ancillary petition with the court and a petition for remission or mitigation.



### Advertisement Certification Report

The Notice of Publication was available on the [www.forfeiture.gov](http://www.forfeiture.gov) web site for at least 18 hours per day between April 1, 2021 and April 30, 2021. Below is a summary report that identifies the uptime for each day within the publication period and reports the results of the web monitoring system's daily check that verifies that the advertisement was available each day.

U.S. v. Nima Rodefshalom, et al.

**Court Case No:** 1:20CR09  
**For Asset ID(s):** See Attached Advertisement Copy

Consecutive Calendar Day Count	Date Advertisement Appeared on the Web Site	Total Hours Web Site was Available during Calendar Day	Verification that Advertisement existed on Web Site
1	04/01/2021	23.9	Verified
2	04/02/2021	23.9	Verified
3	04/03/2021	23.9	Verified
4	04/04/2021	23.9	Verified
5	04/05/2021	23.9	Verified
6	04/06/2021	23.9	Verified
7	04/07/2021	23.9	Verified
8	04/08/2021	23.9	Verified
9	04/09/2021	23.9	Verified
10	04/10/2021	23.9	Verified
11	04/11/2021	23.9	Verified
12	04/12/2021	24.0	Verified
13	04/13/2021	23.9	Verified
14	04/14/2021	23.9	Verified
15	04/15/2021	23.9	Verified
16	04/16/2021	23.9	Verified
17	04/17/2021	24.0	Verified
18	04/18/2021	23.9	Verified
19	04/19/2021	23.9	Verified
20	04/20/2021	23.9	Verified
21	04/21/2021	23.9	Verified
22	04/22/2021	23.9	Verified
23	04/23/2021	23.9	Verified
24	04/24/2021	23.9	Verified
25	04/25/2021	23.9	Verified
26	04/26/2021	23.9	Verified
27	04/27/2021	23.9	Verified
28	04/28/2021	23.9	Verified
29	04/29/2021	23.9	Verified
30	04/30/2021	23.8	Verified

Additional log information is available and kept in the archives for 15 years after the asset has been disposed.